

1 M. Caleb Meyer, Esq.
2 Nevada Bar No. 13379
3 Renee M. Finch, Esq.
4 Nevada Bar No. 13118
5 Christina Mundy-Mamer, Esq.
6 Nevada Bar No. 13181
7 MESSNER REEVES LLP
8 8945 West Russell Road, Suite 300
9 Las Vegas NV 89148
10 Telephone: (702) 363-5100
11 Facsimile: (702) 363-5101
12 E-mail: cmeyer@messner.com
rfinch@messner.com
cmamer@messner.com

13 *Attorneys for Defendant*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 BERTHA MORA, individually,

17 Plaintiff,

18 vs.

19 JOSEPH JOHN TOMASULO, individually;
20 and DOES 1 through 10; and ROE
21 ENTITIES 11 through 20, inclusive,

22 Defendants.

23 Case No. 2:19-cv-01423-GMN-BNW

24 **STIPULATION AND ORDER TO
CONTINUE TRIAL**

25 COMES NOW Defendant JOSEPH JOHN TOMASULO (“Defendant”), by and through his
26 counsel of record, M. Caleb Meyer, Esq., Renee M. Finch, Esq., and Christina Mundy-Mamer, Esq.,
27 of Messner Reeves LLP, and Plaintiff BERTHA MORA, by and through her counsel of record,
Lawrence M. Ruiz, Esq. of the Ruiz Law Firm, and hereby stipulate and request that this Court
continue the trial currently set for August 23, 2021 at 8:30 a.m.

28 This request is necessary as Defendant’s counsel is currently scheduled to begin a firm trial
on August 16, 2021 that is expected to last for three (3) weeks. In addition, following the COVID-
19 public health crisis, both parties’ expert witnesses are experiencing scheduling difficulties. The
parties’ medical experts are also facing additional demands in their daily practice resulting from the
extended state of emergency. As such, the parties merely require additional time to assure that their
respective experts are available to testify at the time of trial.

1 The parties have conferred regarding their respective availability and propose the trial be
2 continued to the January 24, 2022 stack as all parties are available.

3 The parties further request a deadline for all dispositive Motions and Motions *in Limine* be
4 set ninety (90) days before the date of trial.

5 This is the second request for continuance of trial has been requested in this matter. This
6 stipulation and request is entered into in good faith and not for purposes of delay.

7 APPROVED AS TO FORM AND CONTENT.

8 DATED this 16th day of July, 2021.

9 **MESSNER REEVES, LLP**

10 By: */s/ Christina Mundy-Mamer*

11 M. Caleb Meyer, Esq.
12 Nevada Bar No. 13379
13 Renee M. Finch, Esq.
14 Nevada Bar No. 13118
15 Christina Mundy-Mamer, Esq.
16 Nevada Bar No. 13181
17 8945 West Russel Road, Suite 300
18 Las Vegas, Nevada 89148
19 *Attorney for Defendant*

20 **IT IS HEREBY ORDERED that the**
21 **Stipulation is GRANTED in part**
22 **and DENIED IN PART.**

23 The Court GRANTS a continuance
24 of trial to the January 24,
25 2022 trial stack.

26 The Court GRANTS an extension
27 of the Motion in Limine
28 deadline and a new deadline
 will be provided in the Order
 Regarding Trial.

29 The Court DENIES the parties
30 request to extend the
31 dispositive motions deadline.

8 DATED this 16th day of July, 2021.

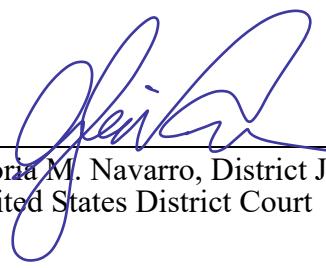
9 **RUIZ LAW FIRM**

10 By: */s/ Lawrence M. Ruiz*

11 Lawrence M. Ruiz, Esq.
12 Nevada Bar No. 11451
13 1055 Whitney Ranch Drive, Suite 110
14 Henderson, NV 89014
15 *Attorney for Plaintiff*

16 **IT IS SO ORDERED.**

17 Dated this 30 day of July, 2021.

18 
19 Gloria M. Navarro, District Judge
20 United States District Court